

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

THE STATE OF MISSOURI;
THE STATE OF TEXAS,

Plaintiffs,

v.

JOSEPH R. BIDEN, in his official capacity as President
of the United States, *et al.*

Defendants.

No. 7:21-cv-00420
(formerly No. 6:21-cv-00052)

THE GENERAL LAND OFFICE OF THE STATE
OF TEXAS, and DAWN BUCKINGHAM, M.D., in
her official capacity as Commissioner of the Texas
General Land Office,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; and ALEJANDRO
MAYORKAS, in his official capacity as Secretary of
the Department of Homeland Security,

Defendants.

No. 7:21-cv-00272

**JOINT MOTION FOR AGREED ENTRY OF ORDER STAYING FEDERAL
DEFENDANTS' DISPOSITION OF BORDER WALL MATERIALS**

Defendants have voluntarily agreed not to dispose of any border wall materials—including bollard wall panels, gates, or drainage materials—to non-federal government entities until February 1, 2025. In accordance with the Court’s direction during the status conference held on December 27, 2024, all Plaintiffs and all Defendants (the Parties) respectfully move the Court to enter the attached proposed order memorializing the Parties’ agreement.

A proposed order is attached.

Date: December 31, 2024

Respectfully submitted,

ANDREW BAILEY
Attorney General of Missouri

KEN PAXTON
Attorney General of Texas

/s/ Joshua M. Divine
JOSHUA M. DIVINE, #69875MO
Solicitor General
Attorney-in-Charge
Southern Dist. of Texas Bar No. 3833606

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

SAMUEL FREEDLUND, #73707MO*
Deputy Solicitor General

AUSTIN KINGHORN
Deputy Attorney General for Legal Strategy

OFFICE OF THE ATTORNEY GENERAL
Supreme Court Building 207
West High Street
P.O. Box 899
Jefferson City, Missouri 65102 Tel.
(573) 751-1800
Fax (573) 751-0774
josh.divine@ago.mo.gov
samuel.freedlund@ago.mo.gov

/s/ Ryan D. Walters
RYAN D. WALTERS
Attorney-in-Charge
Chief, Special Litigation Division
Texas Bar No. 24105085
Southern Dist. of Texas Bar No. 3369185

*Counsel for Plaintiff State of
Missouri*

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548
Austin, Texas 78711-2548
Tel.: (512) 936-1414
Fax: (512) 936-0545
ryan.walters@oag.texas.gov

*Admitted *pro hac vice*

Counsel for Plaintiff State of Texas

s/ Austin R. Nimocks
AUSTIN R. NIMOCKS
Attorney-in-Charge

Texas Bar No. 24002695
S.D. Tex. Bar No. 2972032
austin@pntlawfirm.com

CHRISTOPHER L. PEELE
Of Counsel
Texas Bar No. 24013308
S.D. Tex. Bar No. 31519
chris@pntlawfirm.com

PNT Law Firm
206 Wild Basin Rd. S.
Bldg. A, Ste. 206
Austin, TX 78746
Phone: (512) 522-4893

Counsel for Plaintiffs
Texas General Land Office and
Commissioner Dawn Buckingham, M.D.

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS
Director, Federal Programs Branch

/s/ Andrew I. Warden
ANDREW I. WARDEN (IN Bar #23840-49)
Senior Trial Counsel
MICHAEL J. GERARDI
(D.C. Bar #1017949)
Trial Attorney / Attorney-in-Charge
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW, No. 7506
Washington, D.C. 20005
Tel: (202) 616-5084
Fax: (202) 616-8470
E-mail: Andrew.Warden@usdoj.gov

ALAMDAR S. HAMDANI
United States Attorney

/s/ Daniel D. Hu
DANIEL D. HU
Chief, Civil Division
Assistant United States Attorney
Southern District No. 7959

Counsel for Defendants

CERTIFICATE OF COMPLIANCE

I certify that the foregoing document contains 69 words, exclusive of matters designated for omission, as counted by Microsoft Word.

/s/ Ryan D. Walters
Counsel for Plaintiff State of Texas

CERTIFICATE OF SERVICE

I certify that on December 31, 2024, a true and accurate copy of the foregoing document was electronically filed through the Court's CM/ECF System and that a copy of the foregoing will be sent via email to all parties by operation of the Court's electronic filing system, all consistent with Federal Rule of Civil Procedure 5(b).

/s/ Ryan D. Walters
Counsel for Plaintiff State of Texas